909 625-2323 TELEPHONE NUMBER 012556118661503610 ACCOUNT NUMBER BILL DATE

PAGES OF 6

Important:

Rates decrease for customers with two or more business lines...

If you're a multi-line business customer, this bill includes a decrease in your federal line or access charge effective July 1. The amount varies by state.

This decrease is one of several rate changes in the last six months based on new Federal Communications Commission (FCC) rules intended to implement the Telecommunications Act of 1996.

You'll find this charge under the heading "GTE Basic Service" or "GTE Regulated Service", in most cases on Page 3 of your bill. While the specific wording may be slightly different, this charge appears on your bill as one of the following:

* "Interstate line charge" * "FCC subscriber line charge", or * "FCC access charge"

If you have any questions about this decrease, please contact your GTE account manager or call us toll-free at 1-877-483-5122.



GTE Networl EXHIBIT 7

One GTE Place Thousand Oaks

July 24, 1998

Mr. Scott Sarém MGC Communications 3400 Inland Empire Drive, Suite 201 Ontario CA 91764

Subject: Express Dialtone

Dear Scott,

After completing further research, a field visit is not required when an enduser with GTE Express dialtone signs up with MGC.

I look forward to receiving the results of your audit. You indicated that MGC has approximately 200 residential endusers and approximately 180 of those required a field visit. Please forward me the results of the audit as soon as possible, so that GTE can verify if field visits were performed unnecessarily. Charges will be corrected for any unnecessary field visits.

Sincerely,

Sandra S. Reinbold Account Manager

cc: Ellen Robinson, GTE Steve Sallee, GTE

Sandia S Reinbold

A part of GTE Corporation

D

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of)	
Deployment of Wireline)	
Services Offering Advanced)	
Telecommunications Capability)	
•)	CC Docket No. 98-147
)	
	Ś	

DECLARATION OF JOHN BOERSMA IN SUPPORT OF COMMENTS OF MGC COMMUNICATIONS, INC.

- This Declaration is given in support of the Comments of MGC Communications,
 Inc. ("MGC") in response to the Commission's Notice of Proposed Rulemaking
 ("NPRM") in the above-captioned docket.
- 2. I have personal knowledge of the facts set forth in this Declaration and how those facts relate to the issues raised in the NPRM.
- My name is John Boersma. My business address is 3301 North Buffalo Drive,
 Las Vegas, Nevada 89129.
- 4. I am employed by MGC Communications, Inc. as Vice President of Operations. Since 1987, I have been involved in local telecommunications competition. I have earned an M.S. degree in geophysics in 1988 and an M.B.A. in 1992.
- 5. My Declaration contains a discussion of operational facts occurring in Nevada,

 California and Georgia since December 1996. MGC has experienced a wide

 range of difficulties in obtaining local loops from incumbent local exchange

 carriers ("ILECs"). These ongoing problems arise due to a variety of reasons: (a)

lack of ILEC resources to support the provisioning function; (b) no ordering continuity among the ILECs; and (c) lack of absolute standards to measure the performance of ILECs. In the current regulatory environment, ILECs are permitted to perform poorly, with little consequence short of the CLEC initiating costly, time-consuming litigation before the state commission. Following is a detailed summary of problems experienced by MGC with ILECs and within states in which MGC operates.

NEVADA

- 6. MGC began purchasing local loops from Sprint (the local incumbent for Las Vegas) in December 1996. Since then, the same problems have arisen. These problems continue to recur (albeit to a lesser degree at times), driven by the ILEC's lack of motivation to provide product and service on a timely and accurate basis. Rather than recount all the difficulties dating back to December 1996, I will highlight problems experienced during 1998.
- 7. In January 1998, Sprint continued its poor performance in connection with conversion and installation of both residential and small business accounts. (See attached Exhibit 1). Although the causes were many, the primary cause was Sprint's continuing failure to properly coordinate loop conversions.
- 8. At about this time, Sprint sought the approval of the state commission to jointly market local and long distance services. However, to obtain such approval from the commission, Sprint had to prove to the commission that it could support MGC at a better level of performance. Sprint and MGC entered into a settlement agreement by which Sprint was required to meet certain minimally acceptable performance levels.

- 9. As a result of this incentive, Sprint improved its performance in February and March 1998 to a minimally acceptable level. Sprint obtained its desired authority from the commission. Immediately thereafter, with the incentive to provide acceptable service gone, Sprint's performance began to deteriorate again. (See attached Exhibit 2 showing Sprint's improvement from a 15% error rate to about 5%, returning again to about 15% after obtaining its authority from the commission.)
- 10. By May 1998, with MGC vigilantly urging Sprint to improve its performance, Sprint recognized the "poor quality of service to MGC" (see attached Exhibit 3) and the delays it was causing MGC and its customers (See attached Exhibit 4.) While MGC appreciates the effort, MGC's success will be measured by results, not effort.
- In June 1998, Sprint continued to fail to notify MGC in a timely manner that Sprint was unable to provide unbundled loops to meet service dates to which Sprint committed. MGC filed a complaint with the state commission regarding the timeliness of Sprint's notification of the unavailability of unbundled local loops. (See attached Exhibit 5). This matter has not yet been resolved and the problems continue today.
- 12. In July 1998, MGC, once again, had to bring to Sprint's attention examples of Sprint's lack of coordination causing serious disruptions to MGC's customers.
 (See attached Exhibit 6). Sprint's July performance measured at 14% late and/or troubled installations is particularly deplorable in light of the level achieved in April. (See attached Exhibit 2). This is an example of unacceptable performance

by an ILEC causing irreparable damage to the competitive market. The ILEC simply has no incentive to do an acceptable job. The poorer the ILEC performs, the greater likelihood that the ILEC can drive out of the market those carriers with which it competes.

13. As August began, the same theme continued with Sprint missing 25% of its repair commitments. (See attached Exhibit 7).

GEORGIA

- 14. Bell South's performance in the conversion and installation of business and residence accounts for MGC Communications continues to be unacceptably poor, in spite of clear efforts to improve over the last few months. After recent assurances that Bell South was acting to improve performance (after MGC filed a complaint with the Georgia Public Service Commission), service levels have improved. However, performance is not yet at an acceptable level.
- 15. Exhibit 8 contains order installation performance statistics for BellSouth for February through August 1998. In February, Bell South completed 83% of orders converted or installed either late or with a significant interruption of service. In March, Bell South completed 25% of orders converted or installed either late or with a significant interruption of service. In April, Bell South completed 18% of orders converted or installed either late or with a significant interruption of service. These statistics include residential, business, and payphone orders. Although this level of service was unacceptable, Bell South had seemed to be

- improving on the level of service offered to MGC. Unfortunately, May statistics proved otherwise.
- 16. May 1998 statistics showed a dramatic decrease in the quality of service Bell South provided to MGC. Statistics reporting on orders worked late showed that 50% of orders installed were worked after the Firm Order Commitment date. Statistics reporting on orders troubled showed that 8% of orders installed resulted in significant trouble requiring the customer to be without dial tone. Fifty-eight percent (58%) of orders converted or installed in the month of May were either late or troubled. Since May, the number of late orders has declined significantly but the number of orders with a serious interruption of service has remained at about 10%, substantially interfering with the delivery of service.
- 17. The single largest problem with the service Bell South provides to MGC is orders worked late. Late installs and late conversions accounted for 63% of problems between January and August 1998. These are orders worked beyond the firm order commitment ("FOC") date.
- 18. The second largest problem with service BellSouth provides to MGC is orders installed with field and/or Bell South central office problems. Field problems account for 24% of problems between January and August 1998. An example of this type of ongoing problem is order number COW6HT7. The conversion was to take place on May 22, 1998. The conversion order was worked, however the line was not connected in the Bell South central office until May 25, 1998, resulting in a 3-day loss of dial tone.

- 19. The third largest problem with the service Bell South provides to MGC has been the delay in the remote call forward feature. (BellSouth has now implemented local number portability, superseding remote call forwarding.) The delay of remote call forwarding accounted for 7% of problems between January and August 1998. Order number CO5RDC41 is an example of this continuing problem. The conversion occurred on March 10, 1998, however the remote call forward was delayed by 8 days.
- 20. The final major problem with the service provided by Bell South is the problems occurring within the Bell South assignment center, which often cause delay in the installation of new service or the conversion of an existing service. One example is order number NOCXQVM8. The order was scheduled for April 8, 1998. The existing Bell South telephone number was removed, however the MGC line scheduled to replace the BellSouth line was not installed until April 13, 1998, causing the customer to be without dial tone for 5 days.
- Following is a summary of performance problems with BellSouth between February 1998 and August 1998:

ORDERS WORKED LATE 63%
FIELD AND/OR C.O. PROBLEMS 24%
REMOTE CALL FORWARD DELAYS 7%
ASSIGNMENT ERRORS 6%

22. MGC statistics on Bell South's performance levels are derived from a systems report which records ILEC information relative to the order such as the received order confirmation date, the firm order confirmation date, and the firm order confirmation number. MGC also relies on a trouble ticket system as well as

- information provided by personnel involved in whatever incident which may have occurred.
- 23. MGC has continued to supply BellSouth with a monthly statistical report documenting orders worked late and orders troubled. MGC has committed to provide BellSouth with any documentation necessary to back-up our statistical reports.
- 24. We have no question that Bell South can provide an adequate level of support if sufficiently motivated to do so. As referenced above and supported by recent statistics, BellSouth's performance improved after MGC was forced to file a complaint with the state commission. Regardless of how BellSouth seeks to operate, our interest is in the results. For MGC to provide competitive service to the public, BellSouth must correct these recurring problems.

OPERATIONAL SUPPORT SYSTEMS ("OSS") - ELECTRONIC INTERFACES ("EI")

25. Each ILEC from which MGC orders local loops has a different process and system with which we must interface. The different requirements of each ILEC levies a heavy toll on CLEC resources. Separate system interfaces, additional training and other overhead relating to each ILEC's unique requirements all add a burdensome cost to the CLEC, a cost which the ILEC does not incur. Attached as Exhibit 9 is a comparison of the substantial differences in the ordering function among ILECs.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on September 24, 1998 at Las Vegas, Nevada.

John Boersma



January 20, 1998

Mr. Richard Pfeifer Vice President

Mr. Steve McMahon Vice President

Sprint 330 S. Valley View Blvd. Las Vegas, NV 89152

Dear Richard and Steve:

Sprint's performance in the conversion and installation of business and residence accounts for MGC continues to be unacceptably poor. In spite of repeated assurances that Sprint was acting to improve performance, service levels have actually deteriorated. We are mystified as to why Sprint has failed to provide adequate resources and management attention relative to this issue. We can wait no longer.

In an additional painful irony, we have had several accounts cancel orders or service with us to return to Sprint, due to service problems caused by Sprint. As recently as last week, we experienced a significant interruption of on-going service to a major commercial account for reasons ultimately related to Sprint's failure to work a July order as reported. I have attached Sprint's review of this incident. I am sure you can appreciate how damaging it is to our business to have customers question our competence due to Sprint errors.

In my letter of September 9th to Mr. McMahon, I outlined the type of errors that Sprint was committing on business order conversions. Since that time, we have been in continuous discussion with Brian Theis of your organization about failures to properly handle these types of orders. Since September, we have provided to your organization, detailed narratives of specific installation problems for review 33 times. We provided comprehensive statistics on residence and business performance, including a list of the problems associated with each troubled order for the month of December. I am attaching to this letter a statistical look at December and the first half of January. In spite of this detailed and continuous feedback, Sprint has failed to implement adequate corrective procedures.

In December, Sprint completed 15% of business lines and 9% of residence lines either late or with a significant interruption of service. For the first half of January, the problem rates increased to 26% for business lines and remained unchanged at 9% for residence lines. These statistics do not include payphone lines. This deterioration of service is appalling.

MGC demands that Sprint immediately institute whatever steps are required to improve service to at least the 90% level. 90% is not acceptable, but would indicate movement in the right direction.

We have suggested to Sprint that a Sprint team of dedicated technicians and translations personnel should be created to properly handle our orders. Sprint has declined to implement this proposal. We urge you to reconsider this approach, but the actual corrective action is of course your prerogative and your responsibility. Our interest is in the results.

The single greatest cause of installation problems is the failure to properly coordinate loop conversions with remote call forwarding (RCF). In December 73%, and in January 82% of business troubles were due to failure of RCF coordination. In fact, if RCF coordination failures are eliminated, Sprint's performance levels for business lines would have been 96% in December and 95% in the first half of January. MGC is astonished that after a full year of discussion, Sprint has been unable to get this process under adequate control.

I have no question that Sprint can provide an adequate level of support if sufficiently motivated to do so. I can only conclude, regretfully, that the needed motivation is lacking. MGC has no desire for an adversarial relationship with Sprint. However, we cannot permit current levels of error to continue.

Please let me know if Sprint will be able to provide at least 90% timely, correct, properly coordinated business and residence installs, beginning on February 1st, 1998. If Sprint is unable to commit to even this level, which will not be acceptable in the long run, or does not actually perform at this level, we will have no choice but to file a complaint with the Public Utilities Commission, as provided in Section XIX.D of our Interconnection Agreement, and to take whatever other steps we deem necessary to attempt to ensure adequate performance.

In addition, I am requesting weekly meetings with you both to review progress until performance at the 95% level is achieved. Please let me know your availability for the first such meeting.

Sincerely,

John Boersma

Vice President, Operations

cc: Sharon Thomas, Nevada PUC
Kate Marshall, Nevada State Attorney General's Office
Bob Thompson, Sprint
Brian Theis, Sprint
Nield Montgomery, MGC

Kent Heyman, MGC

CUSTOMER COMPLAINT RESPONSE & ROOT CAUSE ANALYSIS

DATE: 1/19/98

Revised REF: 1/16/98

PREPARED BY: Steve Hank CONTACT #: 702-244-3862 Name: Executive Realty Telephone #: 702-873-4500 Address: 1903 S. Jones

Summary of events, contacts, etc.

Executive Realty lost service to pilot number and 18 associated numbers in pilot group at approximately 0900 on 1/16/98. Complaint from Jennifer at 12:26 PM, requesting immediate restoral of service, claiming there was no request to suspend this customer.

A request to suspend 253-1431 was received by the IPOC. Request was transmitted to Sprint's DBA center in Las Vegas for manual entry. The requested number was part of a group with pilot number 873-4500. Since only pilot numbers can be suspended the group was suspended at 0908.

All service was restored to customer by 1245.

Root cause of complaint:

IPOC received request for suspension from MGC and the request was processed accordingly. Upon further investigation, C873638, written in July 1997 and requesting 253-1431 be removed from hunt group 873-4500, was not worked. Order did flow to billing, so company billing records were correct but the switch configuration was not. Failure to work the order requesting removal of the number from the hunt group in the switch caused this complaint.

The failure of the "C" order to be worked may not be known since this request was in July 1997. However, we did note that ARC (Automated Routing and Completion) recorded network problems on 7/29-30/97, this may have prevented the order from printing to DBA.

Irreversible corrective action taken (what steps have been taken to ensure this never happens again)

Procedures in DBA are being reviewed to: question any request that suspends a number that appears in a hunt group.

Follow-up planned (with dates)

5"RINT LCOPS 'NSTAL! "D (0/01/07 TO 12/01/97

BUSINESS

38 1%

15%

596

19

3%

RESIDENTIAL

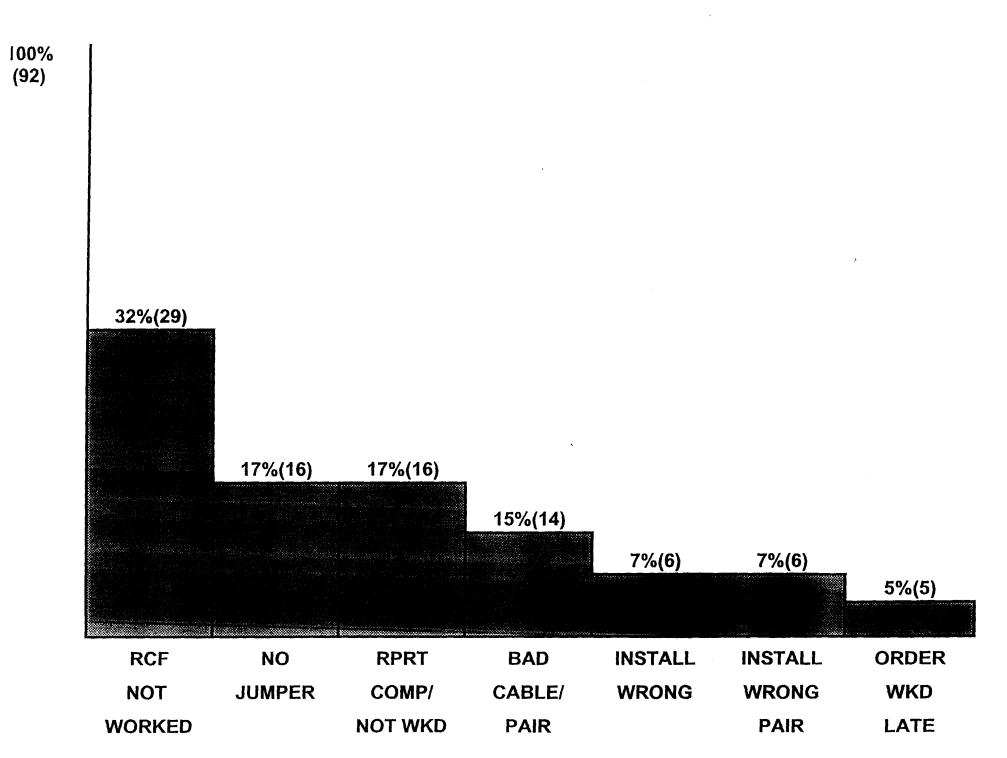
TOTAL

			COMP	%	%	COMP %			COMP	%	%	COMP %			COMP	%	%	COMP %
		COMP	WITH	COMP	COMP W/	PAST DUE	COMP	COMP	WITH	COMP	COMP W/	PAST DUE		COMP	WITH	COMP	COMP W/	PAST DUE
	BUS	PAST	INSTALL	PAST	INSTALL	OR WITH	RES	PAST	INSTALL	PAST	INSTALL	OR WITH	TOTAL	PAST	INSTALL	PAST	INSTALL	OR WITH
Œ	LINES	DUE	PROBLEM	DUE	PROBLEM	PROBLEM	ORDERS	DUE	PROBLEM	DUE	PROBLEM	PROBLEM	COMP	DUE	PROBLEM	DUE	PROBLEM	PROBLEM
1-Dec	46	ol	0	0%	0%	0%	25	1	3	4%	12%	16%	71	1	3	1%	4%	6%
2-Dec	4	0	0	0%	0%	0%	25	1	1	4%	4%	8%	29	1	1	3%	3%	7%
3-Dec	28	0	0	0%	0%	0%	25	0		0%	16%	16%	53	0	4	0%	8%	8%
4-Dec	0	o l	0	0%	0%	0%	13	0		0%	0%	0%	13	- 	0	0%	0%	0%
5-Dec	18	0	0	0%	0%	0%	27	5	3	19%	11%	30%	45	5	3	11%	7%	18%
6-Dec	0	0	0	0%	0%	0%	2	0	1	0%	50%	50%	2	0	1	0%	50%	50%
7-Dec	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%
8-Dec	29	0	2	0%	7%	7%	20	0	3	0%	15%	15%	49	0	5	0%	10%	10%
9-Dec	48	0	29	0%	60%	60%	22	0	2	0%	9%	9%	70	0	31	0%	44%	44%
10-Dec	0	0	0	0%	0%	0%	30	1	0	3%	0%	3%	30	1	0	3%	0%	3%
11-Dec	2	0	0	0%	0%	0%	44	1	2	2%	5%	7%	46	1	2	2%	4%	7%
12-Dec	2	0	0	0%	0%	0%	23	1	0	4%	0%	4%	25	1	0	4%	0%	4%
13-Dec	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%
14-Dec	3	0	0	0%	0%	0%	0	0	0	0%	0%	0%	3	0	0	0%	0%	0%
15-Dec	17	0	6	0%	35%	35%	35	. 0	3	0%	9%	9%	52	0	9	0%	17%	17%
16-Dec	3	0	0	0%	0%	0%	18	0	2	0%	11%	11%	21	0	2	0%	10%	10%
17-Dec	1	0	0	0%	0%	0%	14	4	0	29%	0%	29%	15	4	0	27%	0%	27%
18-Dec	14	0	0	0%	0%	0%	29	1	1	3%	3%	7%	43	1	1	2%	2%	5%
19-Dec	1	0	0	0%	0%	0%	25	0	1	0%	4%	4%	26	0	1	0%	4%	4%
20-Dec	0	0	0	0%	0%	0%	5	1	0	20%	0%	20%	5	1	0	20%	0%	20%
21-Dec	2	0	0	0%	0%	0%	2	0	0	0%	0%	0%	4	0	0	0%	0%	0%
22-Dec	0	0	0	0%	0%	0%	23	0	1	0%	4%	4%	23	0		0%	4%	4%
23-Dec	9	2	0	22%	0%	22%	55	1		2%	2%	4%	64	3	1	5%	2%	6%
24-Dec	0	0	0	0%	0%	0%	7	0	1	0%	14%	14%	7	0	1	0%	14%	14%
25-Dec	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%
26-Dec	3	0	0	0%	0%	0%	5	0	1	0%	20%	20%	8	0		0%	13%	13%
27-Dec	0	0	0	0%	0%	0%	1	0	0	0%	0%	0%	1	0	0	0%	0%	0%
28-Dec	0	0	0	0%	0%	0%	1	0	0	0%	0%	0%	1	0	0	0%	0%	0%
29-Dec	4	0	0	0% 0%	0% 0%	0% 0%	68 30	0	3	0%	4% 0%	4% 0%	72 52	0	3	0% 0%	4% 0%	4% 0%
30-Dec	22 19	0	1	0%	5%	5%	22	2	0	9%	0%	9%	41	2		5%	2%	7%
31-Dec	19			0 70	370	3 70			<u> </u>	370	0 70]	370	411			3 /0	2 /0	/ /0

9%

871

21



RESIDENTIAL LINES INSTALLED 12/01/97 TO 12/31/97

	<u>s.o.</u> <u>NUMBER</u>	NUMBER OF LINES	REASON FOR BAD INSTALL
12/01/97	39072	1	NO JUMPER
	39217	1	BAD CABLE/PAIR
	39339	1	ORDER WORKED LATE
	39458	1	NO JUMPER
12/02/97	38862	1	ORDER WORKED LATE
	39446	1	NO JUMPER
12/03/97	38822	1	NO JUMPER
	39104	1	INSTALLED ON WRONG PAIR
	39503	1	BAD CABLE/PAIR
	39746	1	BAD CABLE/PAIR
12/04/97	NO PROBLEMS		
12/05/97	38831	1	NO JUMPER
	40616	1	BAD CABLE/PAIR
	39877	1	RPRTD COMP, NOT WKD
	39637	1	ORDER WORKED LATE
	39808	1	ORDER WORKED LATE
	39563	1	NO JUMPER
	39481	1	RPRTD COMP, NOT WKD
	39385	1	RPRTD COMP, NOT WKD
12/06/97	39979	1	NO JUMPER
1207/97	NO PROBLEMS		
12/08/97	39971	1	BAD CABLE/PAIR
*	40363	1	NO JUMPER
	40447	1	INSTALLED ON WRONG PAIR
12/09/97	39294	1	NO JUMPER
	40618	1	BAD CABLE/PAIR
12/10/97	40984	1	ORDER WORKED LATE
12/11/97	39689	1	NO JUMPER
	40648	1	RPRTD COMP, NOT WKD
	41227	1	NO JUMPER
12/12/97	39882	. 1	RPRTD COMP, NOT WKD
12/13/97	NO PROBLEMS		
12/14/97	NO PROBLEMS		
12/15/97	40785	1	BAD CABLE/PAIR
	41013	1	BAD CABLE/PAIR
	42086	1	INSTALLED ON WRONG PAIR

RESIDENTIAL LINES INSTALLED 12/01/97 TO 12/31/97

	12/16/97	41572	1	BAD CABLE/PAIR
		41540	1	BAD CABLE/PAIR
	12/17/97	41971	1	RPRTD COMP, NOT WKD
_		40390	1	RPRTD COMP, NOT WKD
_		41971	1	RPRTD COMP, NOT WKD
		41518	1	RPRTD COMP, NOT WKD
	12/18/97	41881	1	BAD CABLE/PAIR
		40709	1	RPRTD COMP, NOT WKD
	12/19/97	42327	1	NO JUMPER
	12/20/97	41877	1	RPRTD COMP, NOT WKD
**	12/21/97	NO PROBLEMS		
-	12/22/97	42743	1	INSTALLED ON WRONG PAIR
	12/23/97	42348	1	RPRTD COMP, NOT WKD
		41848	1	INSTALLED ON WRONG PAIR
**	12/24/97	42981	1	BAD CABLE/PAIR
	12/25/97	NO INSTALLS		
	12/26/97	43236	1	INSTALLED ON WRONG PAIR
	12/27/97	NO PROBLEMS		
	12/28/97	NO PROBLEMS		
*	12/29/97	43570	1	BAD CABLE/PAIR
		43584	1	NO JUMPER
·•		41962	1	BAD CABLE/PAIR
	12/30/97	NO PROBLEMS		
44.	12/31/97	41501	1	RPRTD COMP, NOT WKD
		43727	1	RPRTD COMP, NOT WKD

BUSINESS LINES INSTALLED 12/01/97 TO 12/31/97

REASON FOR

NUMBER

- c gar		NUMBER	OF LINES	BAD INSTALL
	12/01/97	NO PROBLEMS		
	12/02/97	NO PROBLEMS		
- market	12/03/97	NO PROBLEMS		
	12/04/97	NO INSTALLS		
	12/05/97	NO PROBLEMS		
···	12/06/97	NO INSTALLS		
	12/07/97	NO INSTALLS		
nemė.	12/08/97	40829	2	NO JUMPER
	12/09/97	37267 39017 39875 40301	6 8 6 9	RCF NOT WORKED RCF NOT WORKED RCF NOT WORKED RCF NOT WORKED
, also angu	12/10/97	NO INSTALLS		
e _{n gr} aden	12/11/97	NO PROBLEMS		
	12/12/97	NO PROBLEMS		
gar#tu t	12/13/97	NO INSTALLS		
· explained	12/14/97	NO PROBLEMS		
J. samilar	12/15/97	69323	6	ALL LINES REVERSED INSTALLED INCORRECTLY
·	12/16/97 TO 12/23/97	NO PROBLEMS		
Ages which	12/24/97	43055	2	RPRTD COMP, NOT WKD
pudane.	12/25/97 TO 12/30/97	NO PROBLEMS		
News	12/31/97	44284	1	NO JUMPER

S.O.

SPRINT LOOPS INSTALL ED 01/01/08 TO 01/15/90

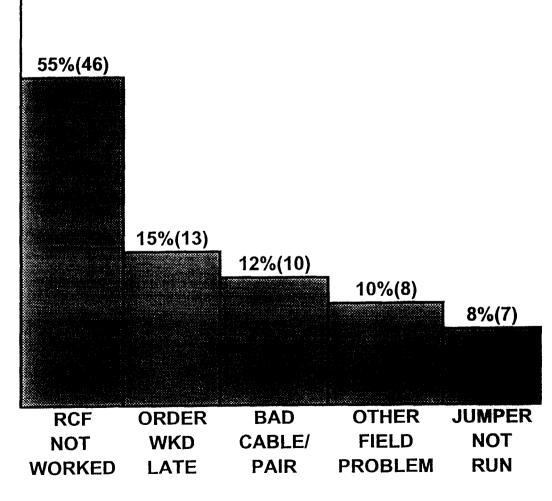
BUSINESS

RESIDENTIAL

TOTAL

			COMP	%	%	COMP %			COMP	%	%	COMP %	J		COMP	%	%	COMP %
	COMP	COMP	WITH	COMP	COMP W/	PAST DUE	COMP	COMP	WITH	COMP	COMP W/	PAST DUE		COMP	WITH	COMP	COMP W/	PAST DUE
	BUS	PAST	INSTALL	PAST	INSTALL	OR WITH	RES	PAST	INSTALL	PAST	INSTALL	OR WITH	TOTAL	PAST	INSTALL	PAST	INSTALL	OR WITH
	LINES	DUE	PROBLEM	DUE	PROBLEM		ORDERS	DUE	PROBLEM	DUE	PROBLEM		COMP	DUE	PROBLEM	DUE	PROBLEM	1
ATE											1					<u> </u>		
Jan	0	0	0	0%	0%	0%	1	0	0	0%	0%	0%	1	0	0	0%	0%	0%
⊹Jan	1	o	0	0%	0%	0%	1	0	1	0%	100%	100%	2	0	1	0%	50%	50%
⊸Jan	0	0	0	0%	0%	0%	3	0	0	0%	0%	0%	3	0	0	0%	0%	0%
-Jan	3	0	0	0%	0%	0%	0	0	0	0%	0%	0%	3	0	0	0%	0%	0%
i√Jan	10	1	0	10%	0%	10%	43	1	4	2%	9%	12%	53	2	4	4%	8%	11%
⊱Jan	3	0	0	0%	0%	0%	21	0	2	0%	10%	10%	24	0	2	0%	8%	8%
-Jan	1	0	0	0%	0%	0%	22	1	0	5%	0%	5%	23	0	0	0%	0%	0%
Jan	29	0	2	0%	7%	7%	7	0	1	0%	14%	14%	36	0	3	0%	8%	8%
⊸Jan	5	0	0	0%	0%	0%	53	1	9	2%	17%	19%	58	1	9	2%	16%	17%
⊸jan	0	0	0	0%	0%	0%	29	2	0	7%	0%	7%	29	2	0	7%	0%	7%
-Jan	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%	0	0	0	0%	0%	0%
⊹Jan	42	4	20	10%	48%	57%	15	0	3	0%	20%	20%	57	4	23	7%	40%	47%
-Jan	29	0	1	0%	3%	3%	44	1	0	2%	0%	2%	73	0	1	0%	1%	1%
-Jan	5	0	0	0%	0%	0%	21	0	2	0%	10%	10%	26	0	2	0%	8%	8%
⊸Jan	87	2	26	2%	30%	32%	53	0	0	0%	0%	0%	140	2	26	1%	19%	20%
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TA	215	7	49	3%	23%	26%	313	6	22	2%	7%	9%	528	13	71	2%	13%	16%





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RESIDENTIAL LINES INSTALLED 01/01/98 TO 01/15/98

	C-ORDER NUMBER	NUMBER OF LINES	REASON FOR BAD INSTALL
01/01/98	NO PROBLEMS		
01/02/98	C-768480	1	NO JUMPER
01/03/98	NO PROBLEMS		
01/04/98	NO INSTALLS		
01/05/98	C-785881	1	RELPACED PROTECTOR
	C-775912	1	NO JUMPER
	C-775986	1	WORKED LATE
	C-782002	1	BAD WIRING @ NID
	C-775717	1	NO JUMPER
01/06/98	C-768476	1	CROSSED LINES
	C-79053	1	NO JUMPER
01/0798	C-783961	1	WORKED LATE
01/08/98	C-790098	1	BAD CABLE/PAIR
01/09/98	C-786773	1	NO JUMPER
	C-786689	1	BAD CABLE DROP
	C-780585	1	WORKED LATE
	C-794069	1	BAD CABLE/PAIR
	C-790098	1	BAD CABLE/PAIR
	C-793523	1	BAD CABLE/PAIR
	C-788441	1	NO JUMPER
4	C-7869689	1	BAD CABLE/PAIR
	C-787298	1	INSTALLED NID
	C-797711	1	BAD CABLE/PAIR
01/10/98	C-799130	2	WORKED LATE
01/11/98	NO INSTALLS		
01/12/98	C-800560	1	LEN NOT CHANGED @ SPRINT
	C-801291	1	BAD CABLE/PAIR
	C-801297	1	BAD CABLE/PAIR
01/13/98	C-807358	1	WORKED LATE
01/14/98	C-814091	1	PROTECTOR ADJUSTMENT
	C-797806	1	NO JUMPER
01/15/98	NO PROBLEMS		

BUSINESS LINES INSTALLED 01/01/98 TO 01/15/98

		C-ORDER NUMBER	NUMBER OF LINES	REASON FOR BAD INSTALL
	01/01/98	NO INSTALLS		
va	01/02/98	NO PROBLEMS		
•	01/03/98	NO INSTALLS		
	01/04/98	NO PROBLEMS		
	01/05/98	C-762709	1	WORKED LATE
	01/06/98	NO PROBLEMS		
	01/07/98	NO PROBLEMS		
ere*	01/08/98	C-745691	2	BAD CABLE/PAIR
,	01/09/98	NO PROBLEMS		
	01/10/98	NO INSTALLS		
fact de	01/11/98	NO INSTALLS		
ч '	01/12/98	C-785908 C-761627 C-82219	20 2 2	RCF NOT COORDINATED WORKED LATE WORKED LATE
Mi And y	01/13/98	C-794306	1	NID INSTALLED
No.	01/14/98	NO PROBLEMS		
	01/15/98	C-818436 C-775790	2 26	RCF NOT COORDINATED RCF NOT COORDINTED/ (2) LINES REVERSED DURING CONVERSION

■ NEVADA/SPRINT □

ORDERS LATE AND/OR TROUBLED

LEC PARITIES

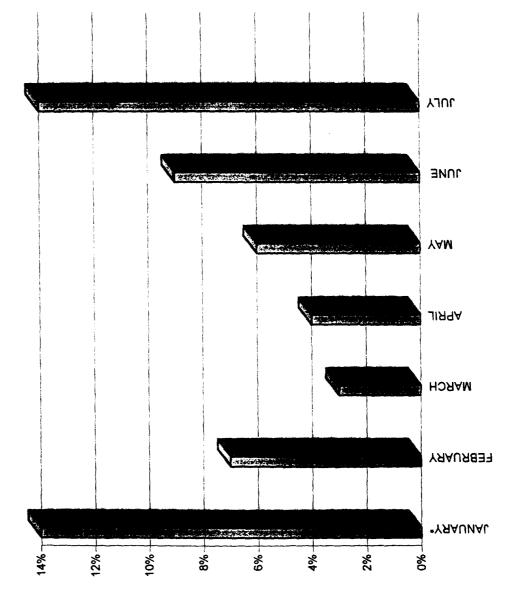




EXHIBIT 3

Nancy Winget
Field Service Manager
Sprint Carrier Markets
330 S. Valley View Blvd.
Las Vegas, NV 89152
Telephone: 702 244-7299

Fax: 702 244-6437

May 21, 1998

Charles Clay MGC Communications Inc. 3301 N. Buffalo Dr. Las Vcgas, NV 89129

Dear Charles,

Sprint has investigated the installation of circuits for Nevada Anesthesia Consultants, which occurred on May 4, 1998. Our investigation determined that two major circumstances resulted in poor quality service to MGC from Sprint.

The first circumstance was Sprint's failure to dispatch an installer who was knowledgeable regarding complex service requirements. As a result of this failure, the installation was not correctly completed until May 6th. Our procedure is to route orders with complex end user equipment to specifically trained installers. Obviously, our procedure failed to properly route this order.

The second circumstance was a result of changes that occurred on the date the order was due. When the installer arrived on site to work the conversion order, he did not have the correct order assignments. In order to alleviate this circumstance happening in the future, the CLEC Customer Care Center has been charged with insuring that the field installer has the most recent order supplement when the conversion begins.

On behalf of Sprint I apologize to you for any inconvenience caused by these circumstances. Our goal is to always provide quality service, obviously, in this case we failed.

Singerely,
Nancy Winget